### EXHIBIT 39

Court File No. M48342, C63309, C63310 Court File No.: CV-12-9808-00CL

### COURT OF APPEAL FOR ONTARIO

BETWEEN:

DANIEL CARLOS LUSITANDE YAIGUAJE, BENANCIO FREDY CHIMBO GREFA, MIGUEL MARIO PAYAGUAJE PAYAGUAJE, TEODORO GONZALO PIAGUAJE PAYAGUAJE, SIMON LUSITANDE YAIGUAJE, ARMANDO WILMER PIAGUAJE PAYAGUAJE, ANGEL JUSTINO PIAGUAJE LUCITANTE, JAVIER PIAGUAJE PAYAGUAJE, FERMIN PIAGUAJE, LUIS AGUSTIN PAYAGUAJE PIAGUAJE, EMILIO MARTIN LUSITANDE YAIGUAJE, REINALDO LUSITANDE YAIGUAJE, MARIA VICTORIA AGUINDA SALAZAR, CARLOS GREFA HUATATOCA, CATALINA ANTONIA AGUINDA SALAZAR, LIDIA ALEXANDRIA AGUINDA AGUINDA, CLIDE RAMIRO AGUINDA AGUINDA, LUIS ARMANDO CHIMBO YUMBO, BEATRIZ MERCEDES GREFA TANGUILA.

LUCIO ENRIQUE GREFA TANGUILA, PATRICIO WILSON AGUINDA
AGUINDA, PATRICIO ALBERTO CHIMBO YUMBO, SEGUNDO ANGEL
AMANTA MILAN, FRANCISCO MATIAS ALVARADO YUMBO, OLGA
GLORIA GREFA CERDA, NARCISA AIDA TANGUILA NARVAEZ,
BERTHA ANTONIA YUMBO TANGUILA, GLORIA LUCRECIA
TANGUILA GREFA, FRANCISCO VICTOR TANGUILA GREFA, ROSA
TERESA CHIMBO TANGUILA, MARIA CLELIA REASCOS REVELO,
HELEODORO PATARON GUARACA, CELIA IRENE VIVEROS
CUSANGUA, LORENZO JOSE ALVARADO YUMBO, FRANCISCO
ALVARADO YUMBO, JOSE GABRIEL REVELO LLORE, LUISA DELIA
TANGUILA NARVAEZ, JOSE MIGUEL IPIALES CHICAIZA, HUGO
GERARDO CAMACHO NARANJO, MARIA MAGDALENA RODRIGUEZ
BARCENES, ELIAS ROBERTO

PIYAHUAJE PAYAHUAJE, LOURDES BEATRIZ CHIMBO TANGUILA, OCTAVIO ISMAEL CORDOVA HUANCA, MARIA HORTENCIA VIVEROS CUSANGUA, GUILLERMO VINCENTE PAYAGUAJE LUSITANDE, ALFREDO DONALDO PAYAGUAJE PAYAGUAJE and DELFIN LEONIDAS

AYAGUAJE and DELFIN LEONIDA PAYAGUAJE PAYAGUAJE

Plaintiffs/Appellants

and

CHEVRON CORPORATION, CHEVRON CANADA LIMITED and CHEVRON CANADA FINANCE LIMITED

Defendants/Respondents

MOTION RECORD OF THE MOVING PARTY

**DATE:** October 10, 2017

### **GRANT HUBERMAN**

Barristers & Solicitors 1075 W. Georgia Street Suite 1620 Vancouver, BC V6E 3C9

### Peter Grant (LSBC#4513)

E: pgrant@grantnativelaw.com

T: (604) 685-1229 F: (604) 685-0244

Lawyers for the Appellants/Plaintiffs, José Miguel Ipiales Chicaiza, Segundo Angel Amanta Milán, Francisco Victor Tanguila Grefa, Hugo Gerardo Camacho Naranjo, Heleodoro Patarón Guaraca, José Gabriel Revelo Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbo Tanguila, Maria Magdaldena Rodriguez Bárcenas and Maria Hortencia Viveros Cusangua

### TO: LENCZNER SLAGHT ROYCE SMITH GRIFFIN LLP

Barristers 130 Adelaide Street West Suite 2600 Toronto, ON M5H 3P5

### Alan J. Lenczner, Q.C.

E: <u>alenczner@litigate.com</u>

T: (416) 865-3093 F: (416) 865-2844

### Brendan F. Morrison

E: <u>bmorisson@litigate.com</u>

T: (416) 865-3559 F: (416) 865-3731

### KOSKIE MINSKY LLP

20 Queen Street West Suite 900 Toronto, ON M5H 3R3

### Kirk M. Baert

E: kmbaert@kmlaw.ca T: (416) 595-2092 F: (416) 204-2889 Celeste Poltak

E: <u>cpoltak@kmlaw.ca</u> T: (416) 595-2701 F: (416) 204-2909

### **Garth Myers**

E: gmyers@kmlaw.ca T: (416) 595-2102 F: (416) 977-3316

Lawyers for the Plaintiffs / Appellants, Daniel Carlos Lusitande Yaiguaje, Benancio Fredy Chimbo Grefa. Miguel Mario Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Simon Lusitande Yaiguaje, Armando Wilmer Piaguaje Payaguaje, Angel Justino Piaguaje Lucitante, Javier Piaguaje Payaguaje, Fermin Paiguaje, Luis Agustin Payaguaje Piaguaje, Emilio Martin Lusitande Yaiguaje, Reinaldo Lusitande Yaiguaje, Maria Victoria Aguinda Salazar. Carlos Grefa Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandria Aguinda Aguinda, Clide Ramiro Aguinda Aguinda, Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda, Patricio Alberto Chimbo Yumbo, Francisco Matias Alvarado Yumbo, Olga Gloria Grefa Cerda, Narcisa Aida Tanguila Narvaez. Bertha Antonia Yumbo Tanguila, Gloria Lucrecia Tanguila Grefa, Celia Irene Viveros Cusangua, Lorenzo Jose Alvarado Yumbo. Francisco Alvarado Yumbo, Luisa Delia Tanguila Narvaez, Elias Roberto Piyahuaje Payahuaje, Lourdes Beatriz Chimbo Tanguila, Octavio Ismael Cordova Huanca, Guillermo Vincente Payaguaje Lustitande, Alfredo Donaldo Payaguaje Payaguaje, and Delfin Leonidas Payaguaje Payaguaje

### AND NORTON ROSE FULBRIGHT CANADA LLP

TO: Barristers and Solicitors
Royal Bank Plaza, South Tower
200 Bay Street
Suite 3800
PO Box 84
Toronto, ON M5J 2Z4

### **Robert Frank**

T: (416) 202-6741

### Clarke Hunter, QC

T: (403) 267-8292 F: (403) 264-5973

### Anne Kirker, QC

T: (403) 267-9564

Lawyers for the Defendant / Respondent, Chevron Canada Finance Limited

### AND GOODMANS LLP

TO: Barristers and Solicitors
Bay Adelaide Centre
333 Bay Street
Suite 3400
Toronto, ON M5H 2S7

### Benjamin Zarnett

T: (416) 597-4204

### Suzy Kauffman

T: (416) 597-6281

### Peter Kolla

T: (416) 597-6279

Lawyers for the Defendant / Respondent, Chevron Canada Limited

### AND OSLER, HOSKIN & HARCOURT LLP

TO: Barristers & Solicitors
First Canadian Place
100 King Street West
Suite 6200
Toronto, ON M5X 1B8

### **Larry Lowenstein** T: (416) 862-6454

Laura Fric

T: (416) 862-6454

Eric Morgan

T: (416) 862-5871

Lawyers for the Defendant / Respondent, Chevron

### INDEX

### MOTION RECORD INDEX

TAB	DOCUMENT	PAGE
1	Notice of Motion	1-7
2	Affidavit of Patricio Salazar Coirdova	8 - 11
A.	Curriculum vitae of Patricio Salazar Coirdova, current as of October 10, 2017	12 – 16
В	Income tax searches by Patricio Salazar Coirdova of moving plaintiffs from the Internal Revenue Services website in Ecuador dated October 10, 2017	17 – 27
С	Income tax searches by Patricio Salazar Coirdova of non-moving plaintiffs from the Internal Revenue Services website in Ecuador dated October 10, 2017	28 – 66
D	Threshold income tax table of Ecuador, current as of October 10, 2017	67 – 70

## TAB 1

Court File No. C63309, C63310 Court File No.: CV-12-9808-00CL

### **COURT OF APPEAL FOR ONTARIO**

BETWEEN:

DANIEL CARLOS LUSITANDE YAIGUAJE, BENANCIO FREDY CHIMBO GREFA, MIGUEL MARIO PAYAGUAJE PAYAGUAJE, TEODORO GONZALO PIAGUAJE PAYAGUAJE, SIMON LUSITANDE YAIGUAJE, ARMANDO WILMER PIAGUAJE PAYAGUAJE, ANGEL JUSTINO PIAGUAJE LUCITANTE, JAVIER PIAGUAJE PAYAGUAJE, FERMIN PIAGUAJE, LUIS AGUSTIN PAYAGUAJE PIAGUAJE, EMILIO MARTIN LUSITANDE YAIGUAJE, REINALDO LUSITANDE YAIGUAJE, MARIA VICTORIA AGUINDA SALAZAR, CARLOS GREFA HUATATOCA, CATALINA ANTONIA AGUINDA SALAZAR, LIDIA ALEXANDRIA AGUINDA AGUINDA, CLIDE RAMIRO AGUINDA AGUINDA, LUIS ARMANDO CHIMBO YUMBO, BEATRIZ MERCEDES GREFA TANGUILA,

LUCIO ENRIQUE GREFA TANGUILA, PATRICIO WILSON AGUINDA
AGUINDA, PATRICIO ALBERTO CHIMBO YUMBO, SEGUNDO ANGEL
AMANTA MILAN, FRANCISCO MATIAS ALVARADO YUMBO, OLGA
GLORIA GREFA CERDA, NARCISA AIDA TANGUILA NARVAEZ,
BERTHA ANTONIA YUMBO TANGUILA, GLORIA LUCRECIA
TANGUILA GREFA, FRANCISCO VICTOR TANGUILA GREFA, ROSA
TERESA CHIMBO TANGUILA, MARIA CLELIA REASCOS REVELO,
HELEODORO PATARON GUARACA, CELIA IRENE VIVEROS
CUSANGUA, LORENZO JOSE ALVARADO YUMBO, FRANCISCO
ALVARADO YUMBO, JOSE GABRIEL REVELO LLORE, LUISA DELIA
TANGUILA NARVAEZ, JOSE MIGUEL IPIALES CHICAIZA, HUGO
GERARDO CAMACHO NARANJO, MARIA MAGDALENA RODRIGUEZ
BARCENES, ELIAS ROBERTO

PIYAHUAJE PAYAHUAJE, LOURDES BEATRIZ CHIMBO TANGUILA, OCTAVIO ISMAEL CORDOVA HUANCA, MARIA HORTENCIA VIVEROS CUSANGUA, GUILLERMO VINCENTE PAYAGUAJE LUSITANDE, ALFREDO DONALDO PAYAGUAJE PAYAGUAJE and DELFIN LEONIDAS

PAYAGUAJE PAYAGUAJE

Plaintiffs/Appellants

and

CHEVRON CORPORATION, CHEVRON CANADA LIMITED and CHEVRON CANADA FINANCE LIMITED

Defendants/Respondents

### NOTICE OF MOTION

(Returnable October 11, 2017)

**CERTAIN OF THE PLAINTIFFS**, represented by Peter Grant and Diane Soroka, will make a motion to the Court of Appeal on October 11, 2017 at 10:00 a.m. or as soon after that time as the motion can be heard, at Osgoode Hall Court House, 130 Queen Street West, Toronto, Ontario.

### PROPOSED METHOD OF HEARING:

The motion is to be heard:

[]	in writing under subrule 37.12.1(1) because it is;
[]	in writing as an opposed motion under subrule 37.12.1(4);
[X]	orally

### THE MOTION IS FOR:

- (a) An order abridging the time for service and validating service of this notice of motion and motion record, if necessary, so that the motion is properly returnable on the date indicated above;
- (b) An order permitting the moving plaintiffs to adduce further evidence of their impecuniosity; and
- (c) Such further and other relief as this Honourable Court deems just.

### THE GROUNDS FOR THE MOTION ARE:

- (a) On September 21, 2017, Epstein JA, in chambers, ordered that the plaintiffs post security for costs for this appeal (the "Decision");
- (b) In the Decision, Epstein JA found that insufficient evidence of impecuniosity was led by the plaintiffs;
- (c) Rule 56.07 permits the court to review a decision on security for costs at any time;

2

(d) Additional evidence is available demonstrating, on a balance of probabilities, that the moving plaintiffs are impecunious;

(e) The Decision was premised on the assumption that the moving plaintiffs cannot demonstrate that they are impecunious;

(f) The moving plaintiffs, due to their impecuniosity, will be unable to proceed with this appeal if they are required to post the substantial security for costs ordered by Epstein JA in the Decision and will likely result in the termination of this important litigation without a consideration of the merits or the justice of their case;

(g) The moving plaintiffs, as they are impecunious, should be allowed to have their appeal decided on its merits rather than on the basis of a security for costs order that they cannot pay;

(h) Rules 1.04(1), 1.04(2), 1.05, 2.01(1), 2.03, 37, 56.01, 56.05, 56.07, 61.06, and 61.16(2) of the *Rules of Civil Procedure*, RRO 1990, Reg. 194;

(i) Section 134(4)(b) of the Courts of Justice Act, RSO 1990, c C.43; and

(j) Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

(a) The motion records on the motion to vary the order for security for costs filed by the parties before this Court;

(b) The Affidavit of Patricio Salazar Cordova, sworn October 10, 2017 and exhibits thereto; and

(c) Such further and other evidence as counsel may advise and this Honourable Court may permit.

**DATE:** October 10, 2017

### **GRANT HUBERMAN**

Barristers & Solicitors 1075 W. Georgia Street Suite 1620 Vancouver, BC V6E 3C9

### Peter Grant (LSBC#4513)

E: pgrant@grantnativelaw.com

T: (604) 685-1229 F: (604) 685-0244

Lawyers for the Appellants/Plaintiffs, José Miguel Ipiales Chicaiza, Segundo Angel Amanta Milán, Francisco Victor Tanguila Grefa, Hugo Gerardo Camacho Naranjo, Heleodoro Patarón Guaraca, José Gabriel Revelo Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbo Tanguila, Maria Magdaldena Rodriguez Bárcenas and Maria Hortencia Viveros Cusangua

### TO: LENCZNER SLAGHT ROYCE SMITH GRIFFIN LLP

Barristers 130 Adelaide Street West Suite 2600 Toronto, ON M5H 3P5

### Alan J. Lenczner, Q.C.

E: alenczner@litigate.com

T: (416) 865-3093 F: (416) 865-2844

### Brendan F. Morrison

E: bmorisson@litigate.com

T: (416) 865-3559 F: (416) 865-3731

### KOSKIE MINSKY LLP

20 Queen Street West Suite 900 Toronto, ON M5H 3R3

### Kirk M. Baert

E: kmbaert@kmlaw.ca T: (416) 595-2092 F: (416) 204-2889

### Celeste Poltak

E: cpoltak@kmlaw.ca T: (416) 595-2701 F: (416) 204-2909

### **Garth Myers**

E: gmyers@kmlaw.ca T: (416) 595-2102 F: (416) 977-3316

Lawyers for the Plaintiffs / Appellants,

Daniel Carlos Lusitande Yaiguaje, Benancio Fredy Chimbo Grefa, Miguel Mario Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Simon Lusitande Yaiguaje, Armando Wilmer Piaguaje Payaguaje, Angel Justino Piaguaje Lucitante, Javier Piaguaje Payaguaje, Fermin Paiguaje, Luis Agustin Payaguaje Piaguaje, Emilio Martin Lusitande Yaiguaje, Reinaldo Lusitande Yaiguaje, Maria Victoria Aguinda Salazar, Carlos Grefa Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandria Aguinda Aguinda, Clide Ramiro Aguinda Aguinda, Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Patricio Alberto Chimbo Yumbo, Francisco Matias Alvarado Yumbo, Olga Gloria Grefa Cerda, Narcisa Aida Tanguila Narvaez, Bertha Antonia Yumbo Tanguila, Gloria Lucrecia Tanguila Grefa, Celia Irene Viveros Cusangua, Lorenzo Jose Alvarado Yumbo, Francisco Alvarado Yumbo, Luisa Delia Tanguila Narvaez, Elias Roberto Piyahuaje Payahuaje, Lourdes Beatriz Chimbo Tanguila, Octavio Ismael Cordova Huanca, Guillermo Vincente Payaguaje Lustitande, Alfredo Donaldo Payaguaje Payaguaje, and Delfin Leonidas Payaguaje Payaguaje

### AND NORTON ROSE FULBRIGHT CANADA LLP

Barristers and Solicitors TO: Royal Bank Plaza, South Tower 200 Bay Street **Suite 3800** PO Box 84 Toronto, ON M5J 2Z4

### **Robert Frank**

T: (416) 202-6741

### Clarke Hunter, QC

T: (403) 267-8292 F: (403) 264-5973

### Anne Kirker, QC

T: (403) 267-9564

Lawyers for the Defendant / Respondent, Chevron Canada Finance Limited

### AND GOODMANS LLP

TO: Barristers and Solicitors
Bay Adelaide Centre
333 Bay Street
Suite 3400
Toronto, ON M5H 2S7

### Benjamin Zarnett

T: (416) 597-4204

### Suzy Kauffman

T: (416) 597-6281

### Peter Kolla

T: (416) 597-6279

Lawyers for the Defendant / Respondent, Chevron Canada Limited

### AND OSLER, HOSKIN & HARCOURT LLP

TO: Barristers & Solicitors
First Canadian Place
100 King Street West
Suite 6200
Toronto, ON M5X 1B8

### Larry Lowenstein

T: (416) 862-6454

### Laura Fric

T: (416) 862-6454

### Eric Morgan

T: (416) 862-5871

Lawyers for the Defendant / Respondent, Chevron

7

•	
NIEL CARLOS LUISTANDE YAIGUAJE et al.	pellants/Moving Party
ď	Ap

-and-

CHEVRON CORPORATION et al. Respondents/Responding Party

# Court File No.: M48342, C63309, C633109 ONTARIO COURT OF APPEAL ONTARIO III COURT OF APPEAL ANOTICE OF MOTION AND ANOTICE OF MOTION

PROCEEDING COMMENCED AT TORONTO

## NOTICE OF MOTION

### Vancouver, BC V6E 3C9 GRANT HUBERMAN 1075 W. Georgia Street Barristers & Solicitors Suite 1620

Document 2091-39

Peter Grant (LSBC#4513) pgrant@grantnativelaw.com T: (604) 685-1229

E: (604) 685-0244

F: (604) 685-0244

Lawyers for the Appellants/Plaintiffs,
José Miguel Ipiales Chicaiza, Segundo Angel Amanta Milániz,
Francisco Victor Tanguila Grefa, Hugo Gerardo Camachoo Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbella Tanguila, Maria Magdaldena Rodriguez Bárcenas and Maria Hortencia Viveros Cusangua Naranjo, Heleodoro Patarón Guaraca, José Gabriel Revelon

### TAB 2

Court File No. M48342, C63309, C63310 Court File No.: CV-12-9808-00CL

### COURT OF APPEAL FOR ONTARIO

BETWEEN:

DANIEL CARLOS LUSITANDE YAIGUAJE, BENANCIO FREDY CHIMBO GREFA, MIGUEL MARIO PAYAGUAJE PAYAGUAJE, TEODORO GONZALO PIAGUAJE PAYAGUAJE, SIMON LUSITANDE YAIGUAJE, ARMANDO WILMER PIAGUAJE PAYAGUAJE, ANGEL JUSTINO PIAGUAJE LUCITANTE, JAVIER PIAGUAJE PAYAGUAJE, FERMIN PIAGUAJE, LUIS AGUSTIN PAYAGUAJE PIAGUAJE, EMILIO MARTIN LUSITANDE YAIGUAJE, REINALDO LUSITANDE YAIGUAJE, MARIA VICTORIA AGUINDA SALAZAR, CARLOS GREFA HUATATOCA, CATALINA ANTONIA AGUINDA SALAZAR, LIDIA ALEXANDRIA AGUINDA AGUINDA, CLIDE RAMIRO AGUINDA AGUINDA, LUIS ARMANDO CHIMBO YUMBO, BEATRIZ MERCEDES GREFA TANGUILA,

LUCIO ENRIQUE GREFA TANGUILA, PATRICIO WILSON AGUINDA AGUINDA, PATRICIO ALBERTO CHIMBO YUMBO, SEGUNDO ANGEL AMANTA MILAN, FRANCISCO MATIAS ALVARADO YUMBO, OLGA GLORIA GREFA CERDA, NARCISA AIDA TANGUILA NARVAEZ, BERTHA ANTONIA YUMBO TANGUILA, GLORIA LUCRECIA TANGUILA GREFA, FRANCISCO VICTOR TANGUILA GREFA, ROSA TERESA CHIMBO TANGUILA, MARIA CLELIA REASCOS REVELO, HELEODORO PATARON GUARACA, CELIA IRENE VIVEROS CUSANGUA, LORENZO JOSE ALVARADO YUMBO, FRANCISCO ALVARADO YUMBO, JOSE GABRIEL REVELO LLORE, LUISA DELIA TANGUILA NARVAEZ, JOSE MIGUEL IPIALES CHICAIZA, HUGO GERARDO CAMACHO NARANJO, MARIA MAGDALENA RODRIGUEZ BARCENES, ELIAS ROBERTO

PIYAHUAJE PAYAHUAJE, LOURDES BEATRIZ CHIMBO TANGUILA,
OCTAVIO ISMAEL CORDOVA HUANCA, MARIA HORTENCIA VIVEROS
CUSANGUA, GUILLERMO VINCENTE PAYAGUAJE LUSITANDE,
ALFREDO DONALDO PAYAGUAJE
PAYAGUAJE and DELFIN LEONIDAS
PAYAGUAJE PAYAGUAJE

Plaintiffs/Appellants

and

CHEVRON CORPORATION, CHEVRON CANADA LIMITED and CHEVRON CANADA FINANCE LIMITED

Defendants/Respondents

AFFIDAVIT OF PATRICIO SALAZAR CÓRDOVA

- I, Doctor Patricio Salazar Córdova, of the City of Cumbayá, Ecuador, MAKE OATH AND SAY:
- I am a lawyer, licenced to practice law in Ecuador. I am fluently bilingual in English and Spanish.
- 2. I have been directly involved in this case since early 2015.
- 3. I am not authorized nor permitted to waive solicitor-client privilege, and nothing in the affidavit can be taken to constitute such a waiver.
- 4. I obtained my law degree from SEK International University, in Quito, Ecuador in July 1999.
- I obtained my Doctor of Jurisprudence from SEK International University, in Quito,
   Ecuador in July 2000.
- 6. I also attended The University of Birmingham, UK, where I obtained an MBA in Public Service in December 2005.
- 7. I have been practicing law in Ecuador since July, 1999. Attached hereto and marked as Exhibit "A" is a true copy of my Curriculum Vitae.
- 8. I am also a member of the board of directors of the Quito Chamber of Commerce, and have held this position for approximately three years.
- 9. I am counsel for the Amazon Defence Front ("FDA") and the ten plaintiffs who have retained Peter Grant as counsel in Canada. Their other legal counsel, in Ecuador, are Angel Cajo, Agustin Salazar, and I work closely with them.
- 10. Since I have been working with the FDA, I have travelled to the Amazon region, where

the plaintiffs reside, on several occasions. I am familiar with the communities and the Amazon region from the time I have spent there with plaintiffs and other community members affected by the environmental pollution ("Affected People").

- Over the time I have spent with the Affected People in the Amazon region, it has become clear to me that all of them have very limited financial resources. I have met hundreds of Affected People on those trips and had community meetings. With few exceptions, the people live on subsistence existence. Many of the Affected People have dirt floors in their homes; they sleep on a mattress on the dirt floor; and they do not have insurance or access to medical treatment. They travel on dirt roads, and work in fields, with no access to an adequate water supply.
- 12. I also have meetings with representatives of the Affected People in Quito and Cumbayá on a weekly basis, as well as phone calls.
- 13. In Ecuador, information regarding income tax returns of individuals and entities are a matter of public record.
- 14. I have completed a search of the income tax filings of the forty-seven plaintiffs named in this matter. Two of the plaintiffs do not even have a taxpayer number, and thus they have not filed returns. Attached hereto and marked as Exhibit "B" are true copies of the ten plaintiffs', who are my clients and that of Mr. Peter Grant, income tax searches completed on the *Servicio de Rentas Internas*, the website for the Internal Revenue Services in Ecuador. Attached hereto and marked as Exhibit "C" are true copies of the remaining thirty-seven palintiffs' income tax searches completed on the *Servicio de Rentas Internas*, the website for the Internal Revenue Services in Ecuador.
- 15. The search provides evidence that only three of the plaintiffs meet the threshold of

4

\$11,920 USD. Below that threshold, they are not required to file tax returns.

- 16. The table also shows any exit tax payable on any monies an Ecuadorian sends overseas, as a 5% exit tax is levied. None of the representative plaintiffs have sent money overseas, as no amounts are listed in the table.
- 17. There are three plaintiffs who have filed income tax returns, and therefore, they are above the threshold. However, they are very close to the threshold, as the top tax payable are is less than \$239 USD. Attached hereto and marked as Exhibit "D" is a true copy of the current threshold income tax table of Ecuador, setting out the tax payable for different incomes.
- 18. According to Ecuadorian law, to be eligible for a loan from any financial institution, an Ecuadorian would have to disclose his/her income tax declaration in order to prove a source of income for repayment of the loan. This cash flow would allow a person to obtain a loan in proportion to their income, by establishing the ability to repay the loan from their income.

SWORN BEFORE ME at the City of Toronto, in the Province of

Ontario, this day of

October, 2017.

A Commissioner for Taking Affidavits

Within Ontario

PATRICIO SALAZAR CÓRDOVA

Christina Shiwsankar a Commissioner, etc. for the Province of Ontario while being a licensed Paralegal This is Exhibit "...." referred to in the affidavit of Patricio Salazar Córbova sworn before me at TORONTO, ON this LOTH day of October 20.17.

A Commissioner for taking Affidavits for Ontario

Christina Shiwsankar a Commissioner, etc. for the Province of Ontario while being a licensed Paralegal

### **CURRICULUM VITAE**

### DR. PATRICIO SALAZAR CÓRDOVA

### PERSONAL INFORMATION

Passport Number:

1707814354

Nationality:

Ecuadorian

Civil Status:
Date of Birth:

Married

Address:

26 October 1975 Chimborazo S3-43 y Velasco Ibarra, Conjunto

Pietralba, Casa 5, Cumbayá

Phone number:

00 593 22041124, Cell. 0999468923

E-mail address:

patriciosalazarcordova@gmail.com

### **EDUCATION**

Degree: MBA Public Service, December 7th 2005, International Development Department,

The University of Birmingham, UK.

Birmingham, September 2004 – December 2005.

Subject of dissertation: The Electric Sector in Ecuador.

Degree: Doctor in Jurisprudence, February 21st 2001, Faculty of Social and Juridical

Science, SEK International University. Quito, October 1993 - July 2000.

Subject of the doctoral thesis: International Commercial Arbitration.

Degree: Lawyer, July 28th 1999, Faculty of Social and Juridical Science, SEK

International University.

Quito, October 1993 - July 1999.

Degree: Bachelor of Juridical Science, Faculty of Social and Juridical Science, SEK

International University.

Quito, October 1993 - July 1998.

### **COURSES**

The University of Birmingham, *Business Management English* Birmingham, UK, August 2004 – September 2004

SEK England, Cultural Studies.

London, UK, January 2000.

Harvard Law School, Program of Instruction for Lawyers.

Cambridge Mass. USA, June 1998.

### PROFESSIONAL BACKGROUND

### Personal Law Office

Legal Counsel, Administrative Law, Tax Law, Human Rights and Environmental Law, Real Estate, Commercial, Negotiation and Intellectual Property, Trust and other structures. November 2010, to present.

### **TROLIBIT**

General Manager/Share holder

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business in Ecuador through the acquisitions of properties, building of commercial stores and finally letting them.

July 2006 to present

### MIDLAND ATALNTIC LLC

Managing Member

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business in Florida USA, through the acquisitions of Single Family Homes, and finally letting them.

October 2010 to present

### CHAMBER OF COMMERCE OF QUITO Med

Member of the Board of Directors

Commerce and Industry

Responsibilities: as part of the board involved in the administration of the Chamber by assisting to board meeting twice a month.

April 2015 to present

### **CHAMBER OF INDUSTRY & COMMERCE**

### **ECUADOR & GREAT BRITAIN**

Member of the Boar of Directors

Commerce and Industry

Responsibilities: as part of the board, contribute to establish and achieve the goals of the Chamber by periodically assisting to the board's meetings every month and events as Director. Represent the Chamber before the International Centre for Arbitration and Mediation

July 2008-June 2010, July 2010-June 2012, July 2012-June 2014

### BRUZZONE & SALAZAR ABOGADOS

Associate Partner/General Manager

Law Firm

Responsibilities: Director Trade Area. Alternative Dispute Resolution Methods. Administrative Law, Constitutional Law, Tax Law, Corporate Law, Civil Procedure and Intellectual Property.

As General Manager responsible for managing all issues related to IT, HR, Finance, Marketing, accounting, and sales.

May 2003 to October 2010.

### **DEXICORP**

General Manager

Real Estate

Responsibilities: Outline, develop and administrate the company related to Real State Business through the acquisitions of properties, building of commercial stores finally letting them with income over \$ 700.000.00 for the year 2005. Activities mainly in Ecuador and subsidiary on Argentina.

March 2003- June 2004; July 2005 December 2006.

### GRUPO KFC-ECUADOR/VENEZUELA

In-house Lawyer, Manager of the Legal Department

Business Group, Services, Fast Food, Real State, Electricity generation and Industry in Ecuador and Venezuela.

Responsibilities: Legal issues, Negotiation (Mergers and acquisitions), Real Estate, Administration.

July 2005 December 2006.

### SAN FRANCISCO UNIVERSITY

Lecturer

Introduction to the Law

Responsibilities: teach, evaluate and promote students

August 2005 – December 2005.

### **GRUPO KFC-ECUADOR**

In-house Lawyer, Manager of the Legal Department

Business Group, Services, Fast Food, Real State and Industry.

Responsibilities: Manage the Legal Department, Trade Law, Corporate Law, Intellectual

Property, Tax Law, Administrative Law, Labour Law, Negotiation.

New stores, manage and negotiate Real Estate projects.

June 2001 – July 2004.

### **PROFILE CONSULTORES**

Junior Lawyer

Law Firm-Consultants

Responsibilities: External consultant for Deloitte & Touché on the Project of Diagnosis and Proposal of the Financial System for the Superintendence of Bank of Ecuador.

Assistance to the development of the Intellectual Property Department of the Firm.

February – June 2001

### PONCE, FERNÁNDEZ DE CORDOBA & SIMON Associate Partner

Law Firm

Responsibilities: Trade Law, Corporate Law, Intellectual Property, Tax Law, Administrative Law, Labour Law, Negotiation, Civil Law, Constitutional Law, Civil Procedure Law.

April 1999 – February 2001.

### SEK INTERNATIONAL UNIVERSITY

Lecturer

Administrative Law

Responsibilities: teach, evaluate and promote students

January 2001 – July 2001.

### SEK INTERNATIONAL UNIVERSITY

Assistant Professor

Civil Law, Assets

Responsibilities: teach and evaluate students

October 2000 - July 2001

### UNIVERSIDAD CATOLICA DE QUITO, (PUCE)

Assistant Professor

Inheritance Successor Law

Responsibilities: teach and evaluate students

October 1999.

### **OUEVEDO & PONCE**

Legal Assistant

Law Firm

Responsibilities: Civil Law, Civil Procedure Law, Administrative Law, Constitutional Law, Corporate Law, Trade Law, Human Rights (Interamerican Court of Human Rights, Case Suárez Rosero), Labour Law, Criminal Law, Transit Law. May, 1995 – April 1999.

### FUNDACIÓN ANTONIO QUEVEDO

Assistant to the Director

Arbitration and Mediation Centre.

Responsibilities: Statutes, Regulations, Ethic Code, list of arbitrators and mediators and approval of the foundation of the Centre.

October 1997 - March, 1999.

### SEK INTERNATIONAL UNIVERSITY

Internship

Free Assistance Centre.

Responsibilities: Civil Law, Civil Procedure Law, Labour Law, Criminal Law and Transit

October 1997 - January 1998.

### SEK INTERNATIONAL UNIVERSITY

President of the Student Union

Responsibilities: Represent the student community and liaison with authorities on Congress, Round Table Seminars and debates in Quito and other cities of the Country November 1998 – October 1999.

### Languages:

Spanish: mother tongue. English: spoken and written.

Christina Shiwsankar a Commissioner, etc. for the Province of Ontario while being a licensed Paralegal esto e le Salida de Divisas

PERSONA NATURAL



## SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPLESTO A LA RENTA Y SALIDA DE DIVISAS

06000	2002.000002
889988	9229
33302	5000
	3000.100
2000	200 TO
	300 × 30
#8000E	100 · 100
S03335	SSS - 85
100	200
SS 100	F1000000000000000000000000000000000000
9990	1889
58888 <b>3</b>	50000 92
	5000 180
	100 C
200308	1000° 100
	<b>編2:2</b>
2000	200. 200
	2333 33
33000	25% 33
880000	100000000
92000 T	100000000000000000000000000000000000000
2000	1615E0000
	990300
2000	200000000000000000000000000000000000000
2222	200000000000000000000000000000000000000
500E00	100000000000000000000000000000000000000
E80000	Section 1
2000	202003393
20000	400000000000000000000000000000000000000
S000	4258000
20000	\$100000000
200	100000000
393883	25000000
	<b>2</b> 000000000000000000000000000000000000
	2000
	20000000000000000000000000000000000000
	100000000000000000000000000000000000000
# S S S S S S S S S S S S S S S S S S S	STATE OF THE PARTY.
	033366
\$200 B	
	2000
	1000
200025	S 20 20 20 2
	000000000000000000000000000000000000000
0.000	10000000
0000000	\$100 C 100 C
533300	
100000	100000000000000000000000000000000000000
1933349	000000000000000000000000000000000000000
257000	E 6007117
	ANGES
800000	600000000000000000000000000000000000000
\$10000E	\$30,000
200000	0200000
	200
77.68	400000
5-4-(S)	22.3
	\$1500000000
100	000000000000000000000000000000000000000
31404	2000000
50708	E88336500
2.20	10000000
774	22000000
. 100	5930000
	100000000000000000000000000000000000000
1.00	20000000
2.188	200000000
94-50	2022
5	100000000000000000000000000000000000000
L 24	\$30000000
5.252	2500000000
5-759	1000000
50.00	\$3355555
1 10	200
BPPSHE	100000000000000000000000000000000000000
E-188	6000 March 1970
L M	60603300
E-1368	100000000
	23750000
F-88	100000000000000000000000000000000000000
- 88	0.0000000000000000000000000000000000000
200	2000
7.00	1332
7.78	250
Design Color	\$385 B
Less	BB 3
1.00	B22 - 6
XXX	1988 - E
277	1007
PA 88	Ellowed S
100.00	23394
	2002 - 12
3 4423	1000
E 2 2 2	100
5.~-B	10000
E. 188	100 × 2
S. 769	The second
	1000 F
least 10	388 S
L 10	100, 1
33	\$350m2
97.0	2000
04400	
在-101	
5.789	
T. 188	2
	1000000
8 - S	2000000
B	100000
2 X X	
2	
7 7 8	
F 48	122000
6	
100 PER 100 PE	190300000
54 M	
É	
<u> </u>	
<u>\$</u>	
Spends:	
spends	
epanbsı)	
Büsqueda	

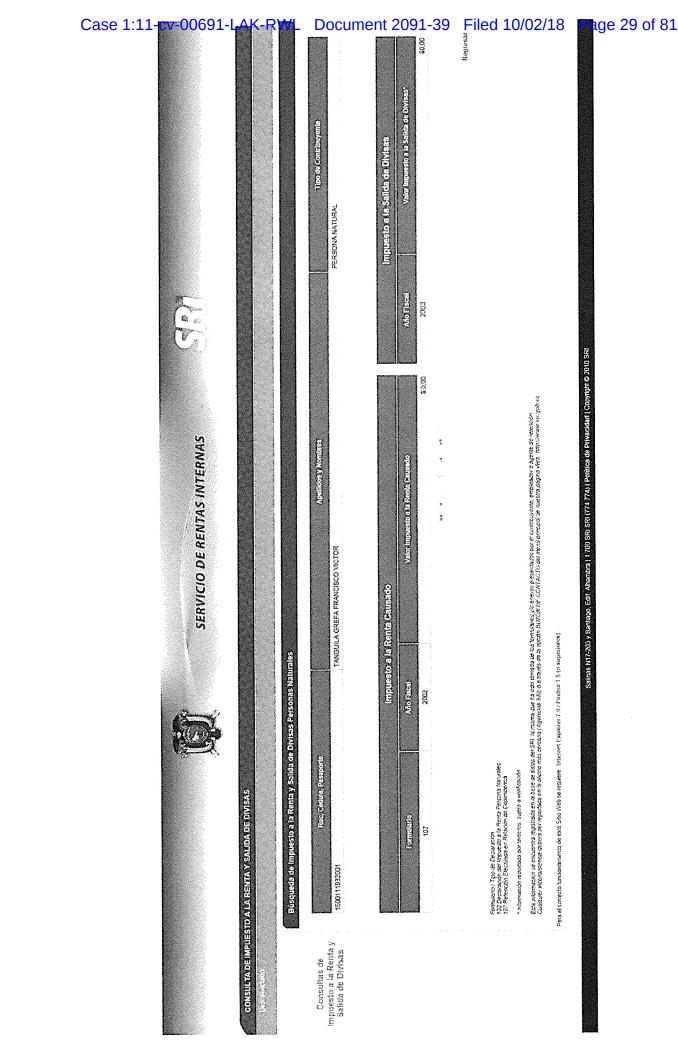
AMANTA MILAN SEGUNDO ANGEL

	Impuesto a la Renta Causado	ausado	
Formulario	Año Fiscal	Valor impuesto e la Renis Cenasdo	And Fiscal
201	2016	55.71	2016
107	2035	63,72,8	2015
107	2034		2014
102	TOTAL CONTRACTOR OF THE PROPERTY OF THE PROPER	The second secon	2013
101	2012	0000\$	2012
201	2033	1000 B	38.41
101			2010
(0)	SOCI	0000	2009
:03	233		2003
107	2007	<b>間の句字</b>	1007
107	2006	500\$	2005
107	2002	CO'OS	2004
107	TOOLS AND	CONTRACTOR AND A CONTRA	2007
t d	8000		2000

Formulano / Tipo de Decisiración 101 Decisiración del Impuesto a la Penta Persona Misurales 107 Resemblo Fleminada en Ratanión de Tenentento

Consultas de Impuesto a la Rents y Salida de Divisas

0200266089





Búsqueda de Impuesto a la Renta y Salida de Divisas Personas

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

CHIMBO TANGULA ROSA TERESA Ruc, Cédula, Pasaporte 1500155524

Consultas de Impuesto a la Renta y Salida de Divisas

Impuesto a la Renta Causado

Formusero / Tipo de Deutsración. 102 Decieración del Insuesto sí la Rema Persona Naturales. 107 Retembién Eléculada en Franción de Dependenas.

\* información repontada por remerca, cujeto a verticación

20

Para el correcto funcionamiento de este São Web se requiere. Internet Explorer 78 : Frestox 1.5 (a supariores)

Velo: mouesto e la Suido de Divisas

After Freeze

\*\*

Impuesto a la Salida de Divisas

Tipo de Costribuyen

PERSONA NATURAL



Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Bruz, Cedulla, Perseporte

REASCOS REVELO MARIA CLELIA

1707057178

Consultas de Impuesto a la Rente y Salida de Divisas Impuesto a la Renta Causado
midano Año Fiscal Vaor Impuesto e la Re

Hadmandri populada por ferenzi signita a verticación. Esta miemoscho se ancientra registrada en la base de kisto del 251 le mans que la seo zemesto de compressor de pertica de debenda en estador de pertica de compressor de pertica de la pertica de la poción ELLECIA ES CONTACTO del menú control de pertica de pertica de pertica de la pertica de pertica de la pertica del la pertica de la pertica del la pertica de la pertica del la pertica del la pertica della per

Formwenn / Tiso de Décidiaséen 102 Deciensolón del Impuento a la Renta Persona Kasusiès 107 Pelanción Elemusica en Refación de Cepantérica Para el conecto Anniaciantento de este São Web se tequese. Internet Explores 7.5 f redox 1.5 fo suberiodés

Sairas M17.203 y Santago. Edif. Athambra | 1700 SRI SRI (774.774) | Politica de Privacidad | Cogyright © 2010 SRI

Valor Impuesto a la Salida de Divises

Moffeet

\*

**8** 

Impuesto a la Salida de Divisas

PERSONA NATURAL



SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales flue, Cedida, Pasaporte Consultas de Impuesto a la Renta y Salida de Divisas

PATARON GUARACA HELEODORO

0600553044001

Vakor Impoesto e la Reula Causado Impuesto a la Renta Causado

Pominamo, / Tao de Decavando 102 Declaración del maneida a la Ronta Pendina Alacalairo 107 Resención Elettuada en Pelando de Cecententa

\* información reportado por testeros, styeta a verdicación.

Pars el conscio funcionamento de osfe Shu, Valb sa requese i internet Explorer I.O.: Firefox I.A. (o supunoseo)

Eth information e encuents repained to that see OFL is mans and seasonable has brancised by ourselven enchanged, embeste is grave is refresh and countries of the seasonable is reported to the seasonable of the seasonable is reported to the seasonable of the season

Consultas de Impuesto a la Renta y Salida de Divissa

2003 2003 2003 2003 2003 2003

Impuesto a la Salida de Divisas

2010

2002 2007 2008

PERSONANATURAL



## SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

the second secon	Salitary Sa			
as Nafurales	Marky.		PIALES CHICAZA JOSE MIGUEL	The second secon
Búsqueda de Impuesto a la Renta y Salida de Divisas Person.	Rue, Cédula, Pasagoria		82076001	
	 Consultas de	impuesto a la Renta y	Salida de Divisas	

Formulano	Airo Facal	Vakor Impoeesto o la Renta Consado
103	2010	
<b>102</b>		
101		e de la companya del companya de la companya de la companya del companya de la companya del la companya del la companya de la
101		O
101		10005
.00	2005	
701		
£6).		10.2
107	2002	ľďs
107	2003	・ こうとのでは Managoria かくしゅう こうていてん Time こうかい かんしゅう しゅうしゅう しゅう アンドラ しゅう Table 2000 できる アンドラ 一角の () () () () () () () () () () () () ()

Formulan / Tao de Declaración. 152 Declaración del miguado a la Ranta Persona Naturalás. 187 Referición Electrada en Ridación de Cepanserica.

\* Información reportada por terceros, supeta a recibiorión

Ein admarch) we excustite ingaloode en is tosse of data en SVI to mans can bush teniads de las riversenses per entrances entression a parte de reserving entre entrement deletel ser reconstants en to data inda sercan (Apartae SVI) on revie de la apaia NSTON DE CIRITACIO del residente autoria de mastre papar. Neu francouver angole en

Velor Impulsation to Salata du Diyean

African 2316

Impuesto a la Salida de Divisas

Tipo de Contriboyenta

PERSONA NATURAL



## SERVICIO DE RENTAS INTERNAS

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Búsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

Riac, Ceticida, Passiportio Appellados y Monthres G200569225081 CAMACHO NARANJO HUGO GENARDO

Consultas de Impuesto a la Renta y Salida de Divisas | Impuesto a la Renta Causado | Fermulario Año Fiscal Valor Impuesto a la Renta Causado | 10.2 20.16 5113,25

Formulario / Tipo de Demanación 102 Decienación del mpuesto a la Rente Pérsona Marurales 107 Tetenación Efectuada en Relación de Depembricas

"uniumodos reportada por fercedos, suesta e verificación.

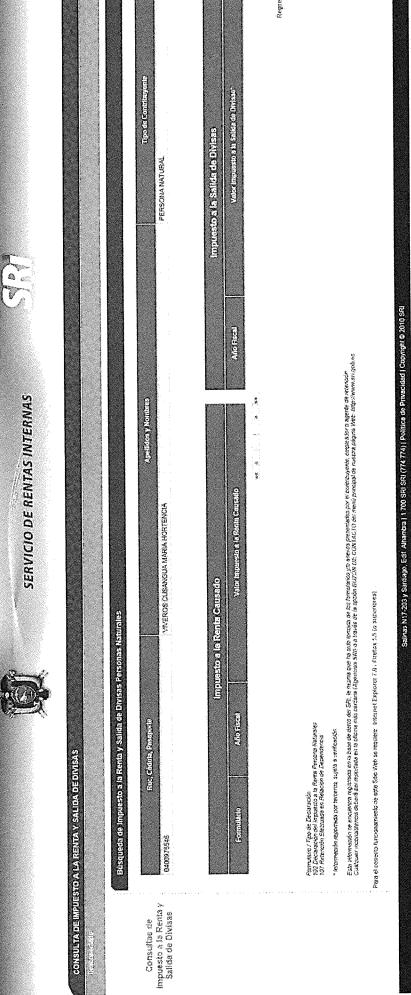
Età estemente a encuenta españada en ta basa de dena da SPI la mana cue ha ado tomada de las homulaina po esenca presentados por el cumbupente, empleado de de aparta de retendor Cosquee monacionado de de deserva papara de en de dizina mas secrans (Agrendas SRD o e tesdo de la aparta 50.77% DE CONTACTO de mendorentado de muesto pápas 40% Adori venensitado en

Pers el correcto funcionamiento de este Sido Web se requiere internar Explorer 7.0 < Firefox 1.5 (o superuma)

Salvas N17-203 y Saniago, Edit. Alhambra | 1 700 SRI SRI (774 774) | Politica de Privacidad | Copright® 2010 SRI

Consultes de Impuesto a la Renta y Salida de Divisas

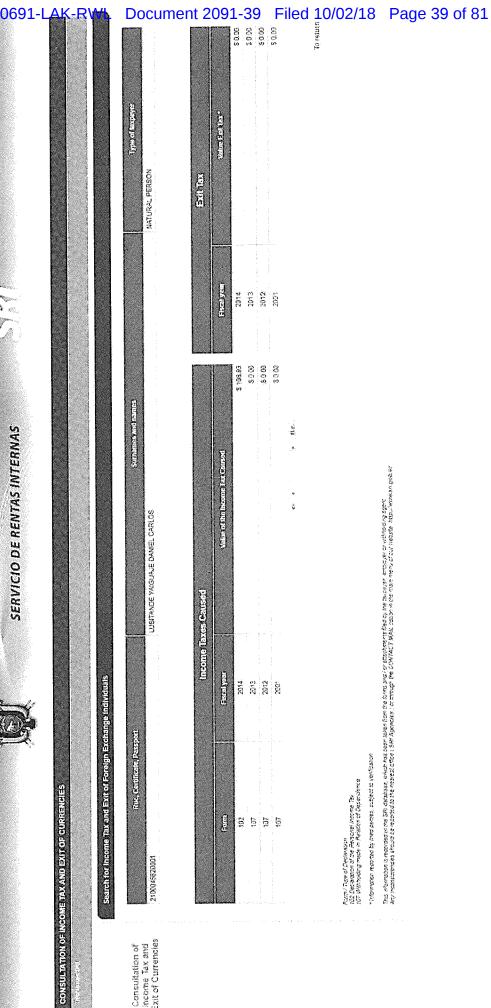




This is Exhibit "...." referred to in the affidavit of Patrzicio Salazar Corpora sworn before me at Toronto, ON this Oth day of October 20.17.

A Commissioner for taking Affidavits for Ontario

Christina Shiwsankar a Commissioner, etc. for the Province of Ontario while being a licensed Paralegal



Tha stomeson is manage in the DET distribute, what has seen inter than the Norman's part of attachment that the seen of the manage of the contact of the con

"(nformation reported by third parties, subject to yenfoallos)

Consultation of income Tax and Exit of Currencies

in the second

मेक्टर विद्यास



	NATURAL PERSO
Sente.	
a par sometans.	CHIMBO GREFA BENÀNCIO FREDOY
Ras, Cartificate, Passport	21900143745

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of income Tax and Exit of Currencies

	2012	2012
2012		107
2012		107 107 108 107 108 108 108 108 108 108 108 108 108 108
2002		107 107 108 107 108 108 108 108 108 108 108 108 108 108

Form / Type of Decisionships 182 Decisiother of the Personal Income Tax 187 Withoushing made in Flexibles of Dependence

historian or notice where were the periods in selection of

The information or reconstruction for the treatment of the form and or alternatives to the total or the contribution about the interest of our interest about the interest and interest a

Value East Tax \*

Fiscal year

Exit Tax

SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

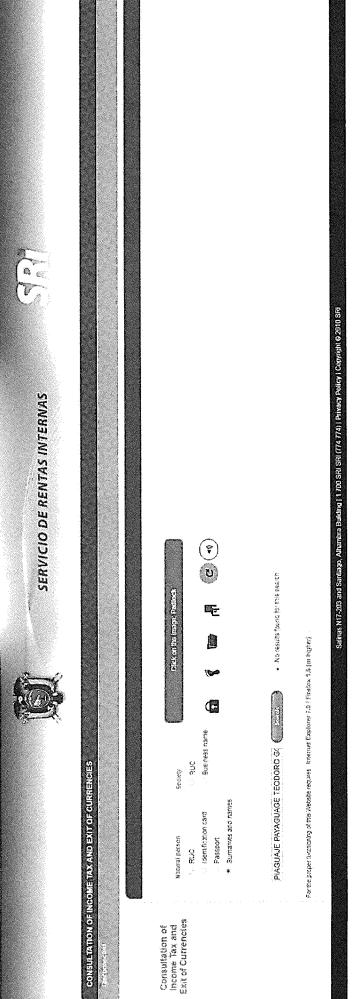
Consultation of Income Tax and Exit of Currencies

		- 1	
		-	
-	4		
-	į		
	1		
		80%	
		134	
		SR.	
		X	
		į	
		- 1	
		10000	
		410	
	2		
	n	- 1	
		1	
	(A)	- 1	
		1	
		D .	
		ũ,	
		E MARIE	
		MIGUEL MARK	
		UAJE MIGUEL MARK	
		ayaguaje miguel mari	
		PAYAGUAJE MIGUEL MARK	
		PAYAGUAJE MIGIJE, MARK	
		PAYAGUAJE MIGUEL, MARI	
		PAYAGUAJE MIGUEL MARI	
		PANAGUAJE MIGUEL MARI	
		PANAGUAJE MIGUEL MARIO	
		PAYAGUAJE MIGUEL, MARI	
	out.	Payaguaje Miguel, Mari	
	Passport	PAYAGUAJE MIGUEL MARI	
	rate, Passport	PAYAGUAJE MARIE MARIE MARIE	
	vetificatu, Passport	PANAGUAJE MIGUEL MARIE	
	tus, Certificate, Passport	PAYAGUAL MIGIET MARIE	
	Ruit, Cetificato, Passport	PANAGLAL MIGHT PROPERTY OF THE	
	Rün, Certificate, Passport	INAMESTICAL PROPERTY OF THE PR	
	Run, Certificata, Passport	HOW THE PROPERTY OF THE PROPER	
	Rur, Certificati, Passport	INVITATION INCOME.	
	Rus, Cetificate, Passport	HOOT TO THE	
	Rin; Ceriffeati, Passport	SS1219001	
	Run, Cariffeatu, Passport	FERNOUN FERNOUN MATURAL PERSON	

5002

Form v Tyzik ad Declaration 102 Declaration of the Personal (rooms Tax 107 Withhilding moste in Helacion of Declaration

The ordination of records of the ATT desease, which has been their story and violation and the happen employed extendibility agent. Any individually expensively included the trouble of the record of communication of the parties and percent of the sentences.



Type of factoryed EXII Tax NATURAL PERSON

Surfames and names

LUSITANDE YARGUAJE SIKON

Search for Income Tax and Exit of Foreign Exchange Individuals

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Rist, Petitionie, Passpor

1500259038031

Consultation of income Tax and Exit of Currencies

e H

Income Taxos Caused

Ram i Typė či Deskaratro 192 Decimaion of the Feronial income Tax 197 Withholang made in Tellarion of Depandense

"untimation reported by take patter, subject to verification

The informants recursed the SR careers with his been taken from the kome and or assemble theory the lastifier or kinntown syon. Any monopromies thous be required to the newest effect, SIM Agenaties at though the COMTACI MAIL caston the man great of our relative than the man and the man

Forthe proper Lacisoting of the Weisstermands - Interpret Exploise 7.0 : Furior 1.5 (or dispur)



SERVICIO DE RENTAS INTERNAS



With Improvio a la Saluta de Divisus

And Fiscal

¥

Impuesto a la Salida de Divisas

Tipo de Commangenta

PERSONA NATURAL

Ē

SERVICIO DE RENTAS INTERNAS



Büsqueda de Impuesto a la Renta y Salida de Divisas Personas Naturales

CONSULTA DE IMPUESTO A LA RENTA Y SALIDA DE DIVISAS

Rus, Cédila, Pasapare
219904552001
PIRGUALE FAVAGUALE ARVANDO WILFRIDO

Consultas de Impuesto a la Renta y Salida de Divisas | Impuesto a la Renta Causado | Formulano | Aña Fisca | Ania Fisca | Valor Impuestos is Renta Causa

Formulation Tabo de Decatatión 192 Decatación del Impolación la Farita Fessora Naturales 107 Fesención Efectuada en Festalon de Departamente

\* información reportada por tenencia, lageta a verificación

Eta artomonda se escuenta nyateraken a tasa de aztas cal SRI, ta mama cue ha soci maza de las bembantas por el cambaparen emparas de mana esta cemana signacias SRI, o e reves so el apolón BIZON BE CONTROTO del ment principal de mesos página 1980. Mas musus apolán esta para promover en como mana pagina si se mesos página 1980. Mas musus apolán esta pagina de menta percepa de menta para pagina si se mesos página 1980. Mas musus apolán esta pagina pagina promover esta pagina p

Exit Tax

Haral year

2012 2013 2013 2013 2013 2013



# SERVICIO DE RENTAS INTERNAS

	3366	38
	(33SS)	
	100000	989
	483333	
	1000	
,	355550	æ
	157357	
	90/48S	
	60,000	
8	192000	
	212,000	
	MODEL T	78
	F98	-88
	100	- 200
8	1388.1	20
	200	100
	282	20
ŧ	2005	.88
	885.1	-84
3	2000	
٤	225	-30
Ē.	1998	99
ŧ	250	22
,	238	79
ŧ	2335	.00
	1660	
	1982 C	38
4	1000	-86
ř	2000	39
٤	EW-	- 23
ŧ	1887T	36
	132	-66
	635	- 10
	1989 m	- 100
ŝ	100	153
8	Tile see	
ŧ.	188	- 28
8	2002 ***	- 1
?	2992	-2
t	200au	-50
	88E.	B
	腦:	2
	₩.	a M
-		
The state of the s		
CONTRACTOR		
CONTRACTOR OF THE PROPERTY OF		
CONTRACTOR	Self of Par	
CONTRACTOR CONTRACTOR CONTRACTOR		
CONTRACTOR	of Self-of Fou	
AND	and Extend For	
AND DISCOURSE AND DESCRIPTIONS OF THE PROPERTY	and Extract Exa	
AN ARMOND AND AN ARMADON OF THE PROPERTY OF TH	and Extract For	
Court of the Contract of the C	cand Extra of Ear	
	The standard Safe of Son	
THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN THE PERSON NAMED IN T	are and Subtralificati	
CONTRACTOR OF THE PROPERTY OF	Par and Extra Con	
CONTRACTOR OF THE PROPERTY OF	The specifical Ear	
	The single Self of For	
	to The and Exit of Ear	
CONTRACTOR OF THE PROPERTY OF	no The and Evil of East	
AND STATES OF THE PROPERTY OF	ma Tay and Extra Feb	
CONTRACTOR OF THE PROPERTY OF	and the and Still of Son	
CONTRACTOR OF THE PROPERTY OF	The state of the state of the state of	
The second secon	Course the such Extra of Ear	
	and the state and sections	
	Income the and Stitle of Eng	
	latening the and Evil of For	
ALL TRAINTEN DOMESTIC SALIDOMS CONTINUED TO SELECTION OF THE SECTION OF THE SECTI	r lacouse for and Extrad For	
CONTRACTOR OF THE PROPERTY OF	or income have and sain of For	
COD CHALLT THA STATE OF THE STA	inclination for and byte of for	
CONTRACTOR OF THE PROPERTY OF	in literate far and Extra of Eng	
CONTRACTOR OF THE PARTY OF THE	the income far and Extra of Eng	
THE DESCRIPTION OF THE PARTY OF	th for Income Tax and Extra of Eng	
THE COURSE AND THE PARTY CANADA CONTRACTOR AND AND AND AND ADDRESS OF THE PARTY CANADA CONTRACTOR AND ADDRESS O	chine income for and Extract for	
	may be income Tax and Extract Son	
CATALOGUE AND AND THE PROPERTY OF THE PARTY	archine lacous for and Self of Son	
	same to the one Tax and Extra of Eng	
	earth inclineous By and Eath of Eop	
	Cearry for Income Tax and Extrol For	
	Seatmb for Income Pay and Extract	
	Cearch for Income Tax and Exit of Foreign Exchange Individuals	

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

ippe of lastpayer	
FQ.	
E .	
Z	
ğ	
12	
4	
4	
13	
had been provided to the company of the first terms	
9.14	
$\Pi$	
(2)	
\$16000000000000000000000000000000000000	
or of the second	
53	
AGES.	
Surpainers and issness NATURAL PERSON	
WER PAGES	
AN.	
PAYAGUAJE JAVIE	

Form	Tecal year	Value of the income Tax Coused
i delimentari e deliminari vigiri e e e e e e e e e e e e e e e e e e	The state of the state of the state of	* The income Statement has not yet been su
102		
	2013	
inspection, in a concernmental to applicate and amongs on the properties of the prop	2012	
and the first order of the first of the firs	2011	
102	8	

Form? Type of Decleration 102 Decleration of the Fersons' Income Tax 107 Withbooking made in Reliator of Dependence

colocies a refer sense of the peness ander a vertical or

The informan is mouted in the 28 decease, which has been been from the furtional of determined for this payer and the first form the new money of undertained fighted by instructions the new of our return of the fighten winds and the

Consultation of Income Tax and Exit of Currencies

Editor

and page

Value of the Income Tax Caused

Income Taxes Caused

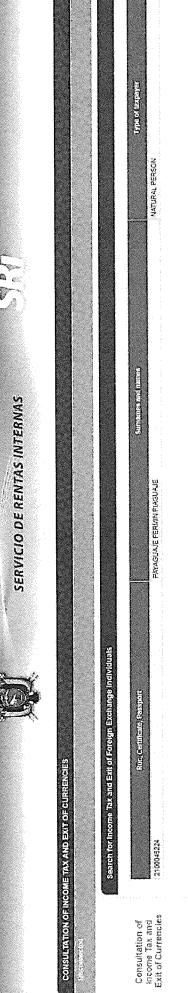
Fiscaliyear

**E b** 

2003

2000

, E



Form i Type of Depteration 152 Decreasion of pe Personal Hoome Tax 101 Whitebalacy mode in Religion of Department

custalino, of basis a service service betages materials?

The information is recorded to the SSI distiblies, mech that sheen she kerns and/or abbotioned between or controlling agent. Any approximations in the major that occorded to the resture intercernations and approximation in the major and the major and the resture intercernations.

Type of factories NATURAL PERSON

Velor Ext Tor-Exit Tax Fixed Williams

3

Make or the income Tex Cassed

Income Taxes Caused

PAYABUAJE PIAGUAJE LUIS AGUSTIN

Farm - Type of Declaration 101 Declaration of the Febronal victime Tax 101 Withhosping made in Resigning Declarations

intermeter respected than series, suspens a series in

The recorded from the DR debath carel the face face for a for a solver the business are the recorded by the case of the recorded the recorded for cases and the recorded for cases and the recorded the recorded for the recorded f

Consultation of Income Tax and Exit of Currencies

1500155716001

Search for Income Tax and Exit of Foreign Exchange Individuals

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Rue, certificate, Passport

SERVICIO DE RENTAS INTERNAS

Exit Tax NATURAL PERSON SERVICIO DE RENTAS INTERNAS å LUSITANDE YAIGUAJE EKILIO MARTIN income Taxes Caused Search for Income Tax and Exit of Foreign Exchange Individuals

Rue, Cartificate, Possport

1500283797

Consultation of income Tax and Exit of Currencies

CONSULTATION OF INCOME TAX AND EXIT OF CURREN

Hack least

H

\* information reported by that parties. Achiec in verdisation Figure 15pe of Declaration 102 Decaration of the Personal roomse Tex 107 Mittandiding made in Petalon of Desemberon

The nkington is proceeding by SR, stables when his eventures for the forms and or distances that by the lastic mental eventual spect. Any incompanies of the present of the newsorth spectral process of the forms and process of the forms of the form

For the proper funcioning of this Webads requires. Insurner Explorer 2.0 : Finelox 1.5 (bit highes)

Consultation of income Tax and Exit of Currencies



[] Consultation Income Tax X

**↓** 

Exit Tax

Heat Man

2010



SERVICIO DE RENTAS INTERNAS

### er verber er stelle er dette er trette er dette er dette

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

	6000 S	
		2
		2
1		35
		12
		H.
		AL PERSO
		35
1		ir.
		1
		3
ŧ		1,465
I		
ł		
•		
1		
1		
l		
ı		
ı		
1		٠.
•		
1		
1		
1 :		
1		
1		
1		
1	幽 幽	
1		
4		
ł		
	<b>**</b>	
I		
ŧ.		
1		
i		
ğ.		
4		
1		
		Q3
		SCI18
		Ω,
Ŗ.		21
1		~
		Z.
		10C4 C
		PATOCA C
		HTATOCA C
		HU4TATOCA C
		A HUATATOCA C
		FA HUATATOCA C
		REFA HUATATOCA C
		GREFA HUAT
		GREFA HUATA
	1	GREFA HUATA
	rort	GREFA HUATA
	Linds	GREFA HUATA
	tiodsep	GREFA HUATA
	Pasport	GREFA HUATA
	le, Passport	GREFA HUATA
	cate, Passport	GREFA HUATA
	lineate, Passport	GREFA HUATA
	etillicate, Passport	GREFA HUATA
	Certificate, Passport	GREFA HUATA
	e, Certificate, Passport	GREFA HUATA
	Ries, Certificate, Passport	ORETA-101A
	Ruc, Certificate, Passport	ORETA-101A
	Ruc, Catificate, Passport	ORETA-101A
	Ruc, Catificate, Passport	ORETA-101A
	Ruc, Certificate, Passport	ORETA-101A
	Ruc, Certificate, Passport	ORETA-101A
	Ruc, Dettingate, Passport	ORETA-101A
	Rue, Certificate, Passport	ORETA-101A
	Rue, Destingate, Passport	ORETA-101A
	Rue, Certificate, Passport	ORETA-101A
	Ruc, Certificate, Passport	ORETA-101A
	Ruc, Certherie, Passport	ONETA HUND
	Rue, Certificate, Passport	ONETA HUND
	Rus, Certificate, Passport	ONETA HUND
	Ruc, Certificate, Passport	ORETA-101A
	Bue, Certificate, Prissport	ONETA HUND
	Rue, Certificate, Passport	ONETA HUND
	Bue, Certificate, Prasport	ONETA HUND

Tracelough

	Fiscallyear	Vetus of the Income Tax Casuad
107	2016	
1	70%	
	e men er er framskriver former er en former men former men former met former men en	
	32	
T	and the second of the second o	
	2630	
2	2008	

Homs / Type of Declaracio. 100 Declaration of the Percura impone Tax 107 Whithoring made in Ferenco of Dependence.

su communication and a management of the parties authorities.

This arternation is express in the Stitl decideds with new start from the forms and or assistance of the experience of the complete or remindence before the manual countries of the manual countries of the manual countries of the manual countries of the countries of the manual countries of the manual countries of the countries of the manual countries of the countries of the manual countries of the countries of t

Maine East Tax

نه ش

SERVICIO DE RENTAS INTERNAS Search for Income Tax and Exit of Foreign Exchange Individuals CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

SACON TO SOL Exti (Tax NATURAL PERSON Filed yes Vehing of the Income Tay Craised AGUINDA SALAZAR CATALINA ANTONIA Income Taxes Caused (III) 155020531

Form Fige of Decisional 102 Decisional of the Personal Income Tax 107 Withmodelig math in Residan of Department

\* Information reported by their paintes, subject to senticanon

Tha receives a receive in the SP accesse, entry has been laren han the storm and a comment from the handle of a An intersected storm to rescribe the nevest offer, SR Agendes, or incust the CONTACT MAIL occan in the handle of publishment of parts.

Consultation of income Tax and Ext of Currenctes

Document 2091-39 Filed 10/02/18 Page 54 of 81 Case 1:11 cv-00691 LAK- WL

First year

2018 2018 2014 2013

2017



## SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of moome Tax and Exit of Currencies

Type of faupoyer

Seems		the Makes of the Income for Chinasel
107	2016	GDS .
107	2000 C	
107		
40;		
107		
101	2011	<b>適の</b> の
701		

Form i Type of December 102 December of the Personal Prome Tax 107 Withdrang nade in Resistor of Objectoerce

The efformancy is recorded in the SPF calculates, which has been taken than the from and, or establishments of the calculates of entroyer or has been after the calculates of the order of the entroyer of the ndestration is trepted on the parties of the person of the property of the pro

Consultation of Income Tax and Exit of Currencies

Exit Tax

Figure 1 20



SERVICIO DE RENTAS INTERNAS



Type of lastpayer NATURAL PERSON CHIMBO YUMBO LUIS ARMANDO Search for Income Tax and Exit of Foreign Exchange Individuals Rec, Certificata, Passpart 1590203540 Consultation of Income Tax and Exit of Currencies

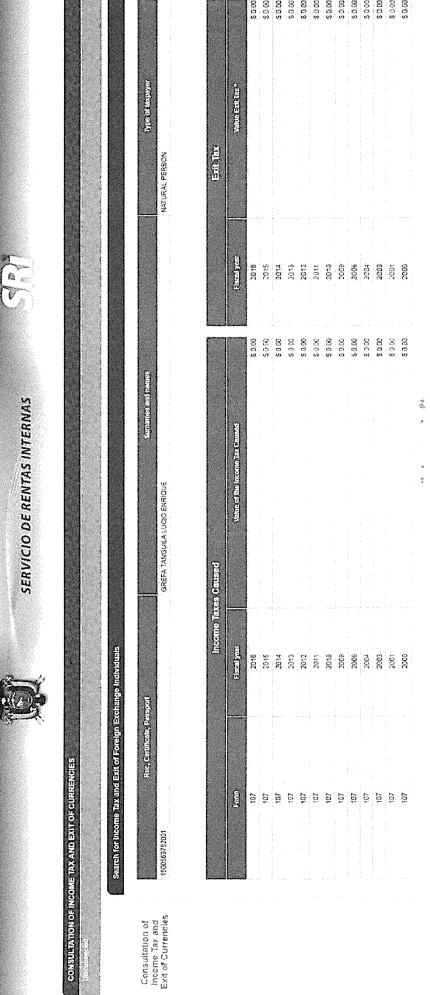


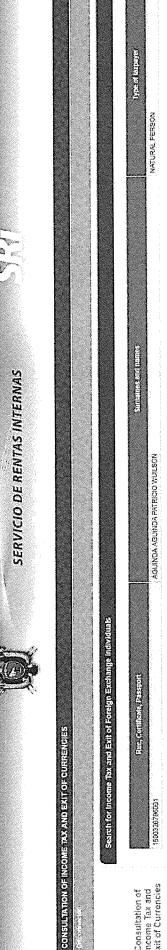
Forms Triple of Deciention 102 Ecolosiscs of the Persons' income Tal 107 Whyhologig prace in Referon of Dependence

Tas internances received or the SP destates when has been later for the forme area or established the lates or amounts or without agent Any november other or expected to the resense office (SP) Agencies in the region of COMTACI MAK, coom or the man mers of our nebster into likewessingles in "Information reported by their parties, suited to verification

40

Consultation of Income Tax and Exit of Currencies





EM lax	Vaine Era tas:	and the second s				A Management of the Administration of the Ad						
	Fiscal year	20:18	26.55	2852	2013	2812	2011	2010	2002	2908	2004	2001
		\$0.00	\$ 0.30	\$5.00	2000	00.00	00.00	8.000	20:00	00.00	30.03	20.00
es Caused	Volue of the income Tax Caused											
income (ax	Ricalyan	2016	2015						2008	3002	2004	2003
	Form	(0)	ζΦι				more reconsistence compare and information of the more management, and they are more effectively will despise	731	107	107	101	107

Consultation of income Tax and Exit of Currencies



Voters Bill Time

Exit Tax

NATURAL PERSON

51

SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF GURRENCIES

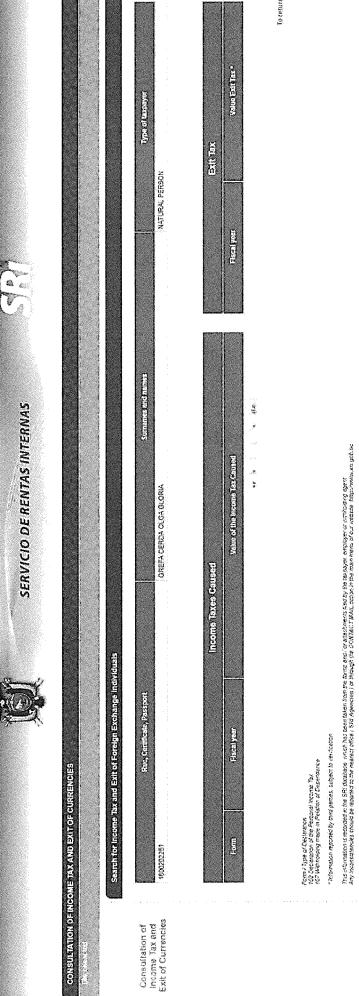
Sumanness and marries ALVARADO YUNBO FRANCISCO MATIAS Search for Income Tax and Exit of Foreign Exchange individuals Ruc, Cerimonie, Pessport 1500093269001 Consultation of Income Tax and Exit of Currencies

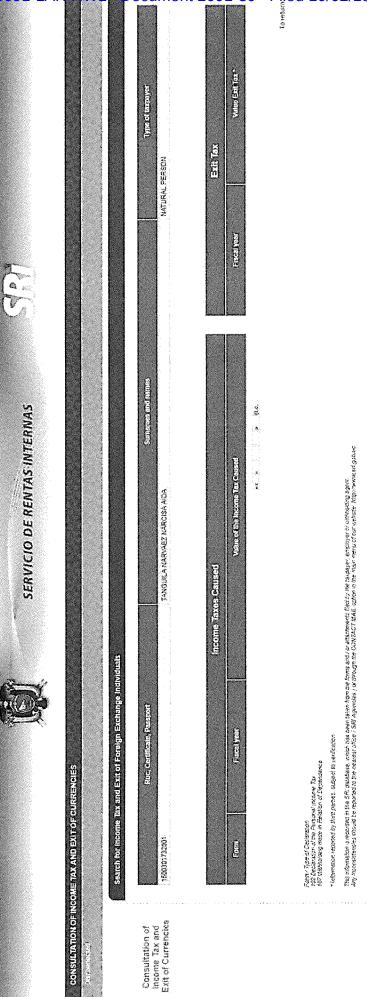
Value of the income. Tox Caused Income Taxes Caused

4

\* information reported by that parties, subject to verification. Form / Time of Designation. 102 Decignation of the Personal Income. Tox. 107 Withhostory, made in Ficturion of Dependence.

This naturation is societat in the SPI assistant, which has been calen form the forms and for assistant that by the hopsey, energied to the natural season of the manufacture of the forms assistance should be reported to the natural forms as ingressed and provided the contraction of the forms as ingressed.





For the proper functioning of the Website regiser internal Exploses 7.15 - Findos 1.5 (or higher)

Volum Extr Taxe Type of factories Estt Tax NATURAL PERSON Fiscal page Sumannes and names SERVICIO DE RENTAS INTERNAS A. ... TRE information is process in the lates that their trains forms and/or existing feet to the aboval or explosing again Any noneastenes whood to repose to the interest after 1918 Agapter) or brought the COMIRGE Wall, oxfor in the main menu of our rebase information and an Value of the Income Tax Caused YUMBO TANGUILA BERTHA ANTONIA Income Taxes Caused Search for Income Tax and Exit of Foreign Exchange Individuals Ruc, Carifficato, Presiport Fiscal year "Antomistion reported by that parties; suggest to verification Form / Type of Decimenton 102 Decimentes of the Persons! Income Tex. 197 Withbiship piece in Releton of Dependence CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES 1500255542001 Log Consultation of income Tax and Exit of Currencies

Consultation of Income Tax and Exit of Currencies

Consultation of Income Tax and Exit of Currencies

Exit Tax



## SERVICIO DE RENTAS INTERNAS

<b>#</b>	
2008 -	

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Consultation of Income Tax and Exit of Currencies

	e g	
		Z
		KS.
		ď
		£
1		N.A.
	1	
	9	
	ğ	
	Ę.	
		0
		Œ
		S ROBERTO
		ă
		n)
		7
		À d
		A.E
		T
		å
	_	
	i i	
	8	
	(ë)	
		_
		109
		13
		CONTISTODI

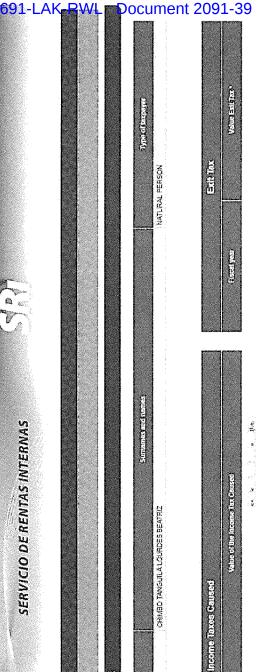
Eom	Fitcal year Vehice	Volue of the Income Tax Caused
102		ĺ
102		
102	The second of th	
10.5	20:2	805
502		2003
201		
102		

8 8 8

Florin / Type of Declination 192 September of the Personal Income Tax 197 Webrockey made in Rejaton of Department

"information reported by med parties, subject to verification

The interests to the SPI delease when the four the form and or standments fled by the tagger employer or estimating agent any invariance of the respect of estimating agent any invariance of the respect to the respect of the standard of th



Form Risk of the Internal Text Coased

From 19th of December of the Francis Coased

From 19th of December of the Francis Coased

From 19th of December of the Francis Coase Co

The normann is record in the SP acides, uses the seen than her the form and, as assenting the instance of the seed of the seed

Consultation of Income Tax and Exit of Currencies

1500254949

Search for Income Tax and Exit of Foreign Exchange Individuals

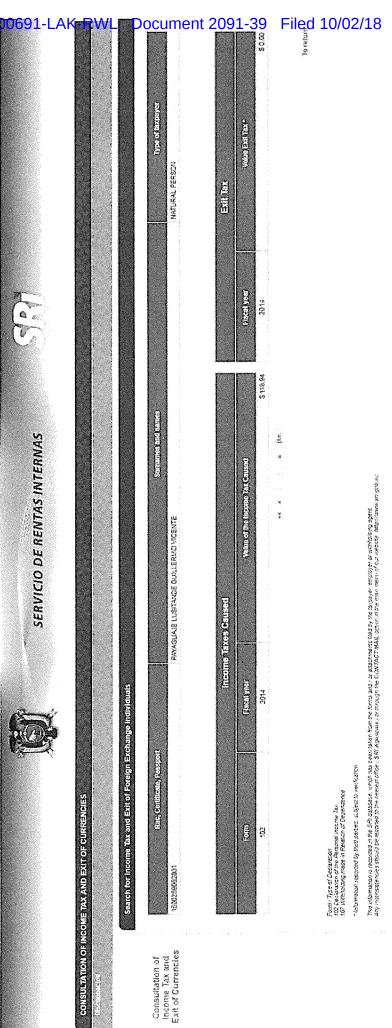
CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Rife, Certificate, Passport

Consultation of Income Tax and Exit of Currencies

Follo

63



Consultation of income Tax and Exit of Currencies

Em Tor

NATURAL PERSON





SERVICIO DE RENTAS INTERNAS

CONSULTATION OF INCOME TAX AND EXIT OF CURRENCIES

Search for Income Tax and Exit of Foreign Exchange Individuals

Rue, Certificate, Passport

1500293005

Consultation of Income Tax and Exit of Currencies

Value of the Income Tax Caused Income Taxes Caused

PAYABUAJE PAYAGUAJE DELFIN LEONIDAS

3

Form / Type of Decisionals (b) Enclosive of the Persons inpute Ter (b) Nutricing made in Relativity of Department

\* information reported by than parties, subject to sentication

For the proper fundacing at the Website requires, enternet, Explorer 3.0 ( Pintox 1.5 for higher)

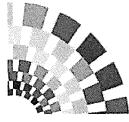
Pos okremen a Roman ne SPI desaste nobel has centeren how ne form end to ansimente SPI de somet end out selvande agen An nomasences amat te epones to tentest after 1814 agenties y at seagun he CARTASI stati, apon in the men man of our sebate insportes and our sebate insporte and our sebate insportes and our sebate inspo

> Christina Shiwsankar a Commissioner, etc. for the Province of Ontario while being a licensed Paralegal



Buscar







Información Servicios on timos Capacitaciones Capacita Enbinada Digital Normativa Tributana Rendicion de cuentas 0.1880

Inicio Información sobre Impuestos Impuesto a la Renta Tarifas

Personas naturales y sucesiones indivisas.- Para liquidar el Impuesto a la Renta en el caso de las personas naturales y de las sucesiones indivisas, se aplicará a la base imponible las siguientes tarifas:

Año 2017 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	11.290	0	0%
11,290	14.390	0	5%
14.390	17.990	155	10%
17.990	21.600	515	12%
21.600	43.190	948	15%
43.190	64.770	4.187	20%
64.770	86.370	8.503	25%
86.370	115.140	13.903	30%
115.140	En adelante	22.534	35%

NAC -DGERGCG16-00000507 de 21/12/2016

Año 2016 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	11.170	0	0%
11.170	14.240	0	5%
14.240	17.800	153	10%
17.800	21.370	509	12%
21.370	42.740	938	15%
42,740	64.090	4.143	20%
64.090	85.470	8.413	25%
85.470	113.940	13.758	30%
113.940	En adelante	22.299	35%

NAC-DGERCGC15-00003195 publicada en el S.R.O. 657 de 28/12/2015

Los beneficiarios de ingresos provenientes de herencias, legados, donaciones, hallazgos y todo tipo de acto o contrato por el cual se adquiera el dominio a título gratuito, de bienes y derechos, pagarán el impuesto, aplicando a la base imponible las tarifas contenidas en la siguiente tabla:

Año 2017 - En dólares			
Fracción Básica	Exceso Hasta	Impuesto Fracción Básica	Impuesto Fracción Excedente
0	71.970	0	0%
71.970	143.930	0	5%
143.930	287.870	3.598	10%
287.870	431,830	17.992	15%
431,830	575.780	39.586	20%
575.780	719,710	68.376	25%
719.710	863.640	104.359	30%
863.640	En adelante	147.538	35%

Octubre 6 | EL SRI SUMA MÁS DENUNCIAS COMO PARTE DE LA LUCHA CONTRA LA **DEFRAUDACIÓN TRIBUTARIA** 

Octubre 5 | AHORA LOS CONTRIBUYENTES PUEDEN SOLICITAR FACILIDADES DE PAGO POR INTERNET

> Guía práctica declaración de Impuesto a la Renta

Campaña Impuesto a la Renta 2017

Resumen principales cambios Reforma Tributaria

Principales cambios tributarios producto del Código de Producción Comercio e Inversiones

Ingresos de fuente ecuatoriana

Exenciones

Deducciones

Tarifas

Determinación del anticipo

Retenciones en la fuente

Preguntas Frecuentes

Herencias Legados y Donaciones

Crédito tributario y reclamos de devolución

Informe de Cumplimiento Tributario (ICT)

Certificados de declaraciones de retenciones por pagos hechos al exterior

1/2

Año 2016 - En dólares Fracción Básica Exceso Hasta Impuesto Fracción Básica Impuesto Fracción Excedente 71.220 0 0% 0 5% 71.220 142.430 142.430 284.870 3.561 10% 284.870 427.320 15% 17.805 427,320 569.770 39.172 20% 569.770 712.200 67,662 25% 712.200 854.630 103.270 30%

NAC-DGERCGC15-00003195 publicada en el S.R.O. 657 de 28/12/2015

145.999

<u>Tablas de cálculo de Impuesto a la Renta 2017</u> Incluye las tablas de cálculo de este impuesto tanto de períodos anteriores como del presente.



35%

### Presidencia

El Presidente La Presidencia Palació de Gobierno

### Vicepresidencia

El Vicepresidente La Vicepresidencia Programas / Servicios

### Secretarias Nacionales

Administración Pública Comunicación Gestión de la Política Planificación y Desarrollo

### Secretarias

854.630

En adelante

Agua Educación Superior, Ciencia, Tecnología e Innovación Desarrollo Amazónico Gestión de Riesgos

### **Ministerios Coordinadores**

Desarrollo Social
Política Económica
Producción, Empleo y
Competitividad
Sectores Estratégicos
Seguridad
Conocimiento

### Ministerios

Agricultura, Ganadería, Acuacultura y Pesca Ambiente Comercio Exterior Cultura y Petrimonio Defensa Nacional Deporte Desarrollo Urbano y Vivienda Educación Electricidad y Energía Renovable Finanzas Inclusión Económica y Social Industrias y Productividad Interior Justicia, Derechos Humanos y Cultos Recursos Naturales no Renovables Relaciones Exteriores y Movilidad Humana Relaciones Laborales Salud Pública Telecomunicaciones y de la Sociedad de la Información Transporte y Obras Públicas Turismo





1700 SRi SRi 774 774 y desde Cuenca 04-2598-441

2/2

CHEVRON CORPORATION et al.

Respondents/Responding Party

### DANIEL CARLOS LUISTANDE YAIGUAJE et al. Appellants/Moving Party

Ca	se 1:11-0	cv-00691-	LAK-RWL	D
Court File No.: M48342, C63309, C6331	ONTARIO COURT OF APPEAL	PROCEEDING COMMENCED AT TORONTO	AFFIDAVIT OF PATRICIO SALAZAR CÓRDOVA	GRANT HUBERMAN
	i			

Peter Grant (LSBC#4513) pgrant@grantnativelaw.com T: (604) 685-1229 F: (604) 685-0244

Vancouver, BC V6E 3C9

1075 W. Georgia Street Barristers & Solicitors

Suite 1620

Naranjo, Heleodoro Patarón Guaraca, José Gabriel Revelo, Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbel Tanguila, Maria Magdaldena Rodriguez Bárcenas and Maria Hortencia Viveros Cusangua T: (604) 685-1229
F: (604) 685-0244

Lawyers for the Appellants/Plaintiffs,
José Miguel Ipiales Chicaiza, Segundo Angel Amanta Miláno
Francisco Victor Tanguila Grefa, Hugo Gerardo Camacho

1:11-cv-00691-LAK-RWL **Document 2091-39** 

DANIEL CARLOS LUISTANDE YAIGUAJE et al. Appellants/Moving Party

-and-

CHEVRON CORPORATION et al. Respondents/Responding Party Court File No.: M48342, C63309, C63310

### COURT OF APPEAL ONTARIO

PROCEEDING COMMENCED AT TORONTO

# MOTION RECORD OF THE MOVING PARTY

Vancouver, BC V6E 3C9 GRANT HUBERMAN 1075 W. Georgia Street Barristers & Solicitors Suite 1620

Peter Grant (LSBC#4513) pgrant@grantnativelaw.com

Llore, Maria Celia Reascos Revero, Lore, Maria Maria Magdaldena Rodriguez Bárcenas and Maria Hortencia Viveros Cusangua I: (604) 685-1229
F: (604) 685-0244

Lawyers for the Appellants/Plaintiffs,
José Miguel Ipiales Chicaiza, Segundo Angel Amanta Milán, Francisco Victor Tanguila Grefa, Hugo Gerardo Camacho Naranjo, Heleodoro Patarón Guaraca, José Gabriel Reveloro Llore, Maria Celia Reascos Revelo, Rosa Teresa Chimbodo